

EXHIBIT A



State of Alabama Unified Judicial System Form ARCiv-93 Rev. 9/18	COVER SHEET CIRCUIT COURT - CIVIL CASE (Not For Domestic Relations Cases)	Case No: 01 Date of Filing: 01/17/2019 Judge Code: <div style="text-align: right; font-size: small;"> 01-CV-2019-900262.00 CIRCUIT COURT OF JEFFERSON COUNTY, ALABAMA JACQUELINE ANDERSON SMITH, Clerk </div>
GENERAL INFORMATION		
IN THE CIRCUIT COURT OF JEFFERSON COUNTY, ALABAMA DENISE MCCURDY v. DOLLAR TREE STORES, INC.		
First Plaintiff: <input type="checkbox"/> Business <input checked="" type="checkbox"/> Individual First Defendant: <input checked="" type="checkbox"/> Business <input type="checkbox"/> Individual <input type="checkbox"/> Government <input type="checkbox"/> Other <input type="checkbox"/> Government <input type="checkbox"/> Other		
NATURE OF SUIT: Select primary cause of action, by checking box (check only one) that best characterizes your action:		
TORTS: PERSONAL INJURY <input type="checkbox"/> WDEA - Wrongful Death <input checked="" type="checkbox"/> TONG - Negligence: General <input type="checkbox"/> TOMV - Negligence: Motor Vehicle <input type="checkbox"/> TOWA - Wantonness <input type="checkbox"/> TOPL - Product Liability/AEMLD <input type="checkbox"/> TOMM - Malpractice-Medical <input type="checkbox"/> TOLM - Malpractice-Legal <input type="checkbox"/> TOOM - Malpractice-Other <input type="checkbox"/> TBFM - Fraud/Bad Faith/Misrepresentation <input type="checkbox"/> TOXX - Other: _____ TORTS: PERSONAL INJURY <input type="checkbox"/> TOPE - Personal Property <input type="checkbox"/> TORE - Real Properly OTHER CIVIL FILINGS <input type="checkbox"/> ABAN - Abandoned Automobile <input type="checkbox"/> ACCT - Account & Nonmortgage <input type="checkbox"/> APAA - Administrative Agency Appeal <input type="checkbox"/> ADPA - Administrative Procedure Act <input type="checkbox"/> ANPS - Adults in Need of Protective Services	OTHER CIVIL FILINGS (cont'd) <input type="checkbox"/> MSXX - Birth/Death Certificate Modification/Bond Forfeiture Appeal/Enforcement of Agency Subpoena/Petition to Preserve <input type="checkbox"/> CVRT - Civil Rights <input type="checkbox"/> COND - Condemnation/Eminent Domain/Right-of-Way <input type="checkbox"/> CTMP - Contempt of Court <input type="checkbox"/> CONT - Contract/Ejectment/Writ of Seizure <input type="checkbox"/> TOCN - Conversion <input type="checkbox"/> EQND - Equity Non-Damages Actions/Declaratory Judgment/Injunction Election Contest/Quiet Title/Sale For Division <input type="checkbox"/> CVUD - Eviction Appeal/Unlawful Detainer <input type="checkbox"/> FORJ - Foreign Judgment <input type="checkbox"/> FORF - Fruits of Crime Forfeiture <input type="checkbox"/> MSHC - Habeas Corpus/Extraordinary Writ/Mandamus/Prohibition <input type="checkbox"/> PFAB - Protection From Abuse <input type="checkbox"/> EPFA - Elder Protection From Abuse <input type="checkbox"/> FELA - Railroad/Seaman (FELA) <input type="checkbox"/> RPRO - Real Property <input type="checkbox"/> WTEG - Will/Trust/Estate/Guardianship/Conservatorship <input type="checkbox"/> COMP - Workers' Compensation <input type="checkbox"/> CVXX - Miscellaneous Circuit Civil Case	
ORIGIN: F <input checked="" type="checkbox"/> INITIAL FILING A <input type="checkbox"/> APPEAL FROM DISTRICT COURT O <input type="checkbox"/> OTHER R <input type="checkbox"/> REMANDED T <input type="checkbox"/> TRANSFERRED FROM OTHER CIRCUIT COURT		
HAS JURY TRIAL BEEN DEMANDED? <input checked="" type="checkbox"/> YES <input type="checkbox"/> NO Note: Checking "Yes" does not constitute a demand for a jury trial. (See Rules 38 and 39, Ala.R.Civ.P., for procedure)		
RELIEF REQUESTED: <input checked="" type="checkbox"/> MONETARY AWARD REQUESTED <input type="checkbox"/> NO MONETARY AWARD REQUESTED		
ATTORNEY CODE: <div style="display: flex; justify-content: space-between;"> EAR008 1/17/2019 8:03:23 AM /s/ EDMOND DEWAYNE EARLE </div> <div style="display: flex; justify-content: space-between; font-size: x-small;"> Date Signature of Attorney/Party filing this form </div>		
MEDIATION REQUESTED: <input type="checkbox"/> YES <input checked="" type="checkbox"/> NO <input type="checkbox"/> UNDECIDED		
Election to Proceed under the Alabama Rules for Expedited Civil Actions: <input type="checkbox"/> YES <input checked="" type="checkbox"/> NO		

**IN THE CIRCUIT COURT OF JEFFERSON COUNTY, ALABAMA
BIRMINGHAM DIVISION**

**DENISE MCCURDY, an individual
Plaintiff,**

V.

**DOLLAR TREE STORES, INC d/b/a
DOLLAR TREE; A, B, C, the person, firm,
business, corporation or entity who owned
and/or controlled the premises where the
injury occurred; D, E, and F, the person,
firm, business corporation, or entity who
caused injury to the Plaintiff as set forth
hereinbelow; G, H, and I, the person, firm
or corporation who was the employer master
and/or principal of the person who caused
injury to the Plaintiff at the times and places
made the basis of this suit and who was
responsible of making inspections at said
DOLLAR TREE, as set forth hereinbelow;
all of whose true names and identities are
otherwise unknown to the Plaintiff at this
time but will be added by Amendment as
soon as same are ascertained
Individually and jointly.
Defendant(s).**

STATEMENT OF PARTIES

1. The Plaintiff, Denise McCurdy is above the age of 19 and has been a resident of Jefferson County, Alabama at least six (6) months preceding the filing of said lawsuit.
2. The Defendant, Dollar Tree Stores, Inc., upon information and belief, is a domestic corporation doing business in Jefferson County, AL and throughout the state of Alabama, at material times referred to herein.
3. Fictitious Parties A, B, C, D, E, F, G, H, and I are those individuals, entities, corporations, or partnerships who are not known at this time, but will be added by amendment where ascertained that caused injury to the Plaintiff and who owned and/or controlled the premises where the injury occurred.

COMPLAINT

4. On or about January 18, 2017, Plaintiff Denise McCurdy, (herein Plaintiff McCurdy), while an invitee on the premises of the Defendant Dollar Tree Stores, Inc, (herein Defendant Dollar Tree), located at 2320 CenterPoint Pkwy, Center Point, AL 35215. While on the premises of the Defendant's store, Plaintiff McCurdy walked down an aisle and slipped on a liquid substance on the floor of said premises.

COUNT I
NEGLIGENCE OR WANTONNESS

5. On or about the 18th day of January, 2017, Plaintiff McCurdy, while an invitee, was upon the premises of Dollar Tree Store located at 2320 Centerpoint Pkwy in Centerpoint, AL, when she slipped and fell on a liquid substance in the aisle of the store and was injured.
6. Plaintiff's said fall was the proximate result of the named Defendant's and fictitious Defendants' negligence and/or wantonness in that the named Defendant and fictitious Defendants, with knowledge that a dangerous and slippery substance was on the floor of the premises, allowed said substance to remain there without cleaning it up and without warning Plaintiff of the presence of the substance or the danger it posed.
7. As a proximate consequence of the negligence and/or wantonness of the Defendants, whether named or fictitiously alleged, the Plaintiff was caused to suffer physical and emotional injuries which include the following damages and injuries:
 - a.) Plaintiff suffered and continues to suffer from soreness and physical pain;
 - b.) Plaintiff suffered injuries/strains/sprains to her left side of hip, left leg, and lower back.
 - c.) Plaintiffs suffered pain and suffering and will continue to suffer such severe pain and suffering;
 - d.) Plaintiffs incurred expenses for medical treatment, medicine and physician's fees. Further, Plaintiffs will be caused to continue to incur such expenses in the future in order to alleviate the injuries, pain and suffering;
 - e.) Plaintiffs suffered severe mental anguish from injuries sustained as result of the willful wanton negligent acts of Defendant Dollar Tree Stores, Inc and fictitious defendants and will continue to suffer such severe mental anguish;
 - f.) As a result of Defendant Dollar Tree Stores, Inc. conduct, Plaintiff sustained a physical impairment and will continue to suffer from said physical impairment in the future, which results in a loss of ability to earn money and of actual earnings.

g.) As a result of said incident, Plaintiffs are prevented from participating and enjoying the benefits of a full and complete life.

COUNT II
NEGLIGENT SUPERVISION

8. The Plaintiff adopts and realleges the preceding paragraphs one through seven and further alleges as follows:

9. Upon information and belief, Plaintiff believes that the Defendant failed to properly train, direct, and/or supervise its employees on the premises known as Dollar Tree, which gave rise to the basis of this complaint.

WHEREFORE WITH ALL PREMISES CONSIDERED, Plaintiff demands a judgment against the Defendant for actual, punitive and general damages, and such other damages as allowed by the State of Alabama in an amount in excess of this Honorable Court's Jurisdictional limit for the injuries caused by Defendant.

Respectfully Submitted,

/s/ Edmond D. Earle
Edmond D. Earle (EAR008)
Attorney for the Plaintiff

OF COUNSEL:

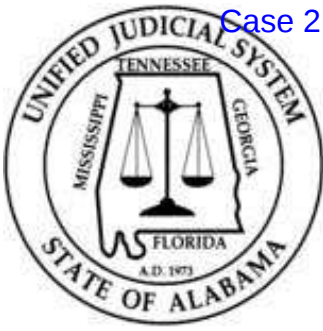
The Earle Law Firm, LLC
1820 7th Ave. North, Suite 105
Birmingham, AL 35203
Phone: (205) 458-0041
Fax: (205) 458-0015
Email: earle@earlelawfirm.com

PLAINTIFF DEMANDS A TRIAL BY JURY

DEFENDANT MAY BE SERVED BY CERTIFIED MAIL AS FOLLOWS:

REGISTERED AGENT of Dollar Tree Stores, Inc.

**Corporation Service Company, Inc.
641 South Lawrence Street
Montgomery, AL 36104**



AlaFile E-Notice

01-CV-2019-900262.00

To: EDMOND DEWAYNE EARLE
earle@earlelawfirm.com

NOTICE OF ELECTRONIC FILING

IN THE CIRCUIT COURT OF JEFFERSON COUNTY, ALABAMA

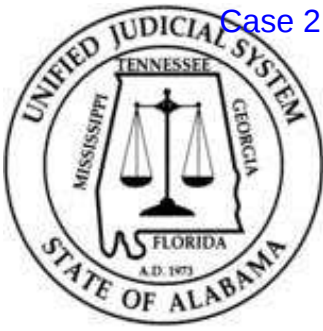
DENISE MCCURDY V. DOLLAR TREE STORES, INC.
01-CV-2019-900262.00

The following complaint was FILED on 1/17/2019 8:03:58 AM

Notice Date: 1/17/2019 8:03:58 AM

JACQUELINE ANDERSON SMITH
CIRCUIT COURT CLERK
JEFFERSON COUNTY, ALABAMA
JEFFERSON COUNTY, ALABAMA
716 N. RICHARD ARRINGTON BLVD.
BIRMINGHAM, AL, 35203

205-325-5355
jackie.smith@alacourt.gov



AlaFile E-Notice

01-CV-2019-900262.00

To: DOLLAR TREE STORES, INC.
2320 CENTERPOINT PARKWAY
CENTERPOINT, AL, 35215

NOTICE OF ELECTRONIC FILING

IN THE CIRCUIT COURT OF JEFFERSON COUNTY, ALABAMA

DENISE MCCURDY V. DOLLAR TREE STORES, INC.
01-CV-2019-900262.00

The following complaint was FILED on 1/17/2019 8:03:58 AM

Notice Date: 1/17/2019 8:03:58 AM

JACQUELINE ANDERSON SMITH
CIRCUIT COURT CLERK
JEFFERSON COUNTY, ALABAMA
JEFFERSON COUNTY, ALABAMA
716 N. RICHARD ARRINGTON BLVD.
BIRMINGHAM, AL, 35203

205-325-5355
jackie.smith@alacourt.gov

State of Alabama Unified Judicial System Form C-34 Rev. 4/2017	SUMMONS - CIVIL -	Court Case Number 01-CV-2019-900262.00
---	------------------------------------	---

IN THE CIRCUIT COURT OF JEFFERSON COUNTY, ALABAMA
DENISE MCCURDY V. DOLLAR TREE STORES, INC.

NOTICE TO: DOLLAR TREE STORES, INC., 2320 CENTERPOINT PARKWAY, CENTERPOINT, AL 35215
(Name and Address of Defendant)

THE COMPLAINT OR OTHER DOCUMENT WHICH IS ATTACHED TO THIS SUMMONS IS IMPORTANT, AND YOU MUST TAKE IMMEDIATE ACTION TO PROTECT YOUR RIGHTS. YOU OR YOUR ATTORNEY ARE REQUIRED TO FILE THE ORIGINAL OF YOUR WRITTEN ANSWER, EITHER ADMITTING OR DENYING EACH ALLEGATION IN THE COMPLAINT OR OTHER DOCUMENT, WITH THE CLERK OF THIS COURT. A COPY OF YOUR ANSWER MUST BE MAILED OR HAND DELIVERED BY YOU OR YOUR ATTORNEY TO THE PLAINTIFF(S) OR ATTORNEY(S) OF THE PLAINTIFF(S), EDMOND DEWAYNE EARLE
(Name(s) of Attorney(s))

WHOSE ADDRESS(ES) IS/ARE: 1820 7TH AVENUE NORTH SUITE 105, BIRMINGHAM, AL 35203
(Address(es) of Plaintiff(s) or Attorney(s))

THE ANSWER MUST BE MAILED OR DELIVERED WITHIN 30 DAYS AFTER THIS SUMMONS AND COMPLAINT OR OTHER DOCUMENT WERE SERVED ON YOU OR A JUDGMENT BY DEFAULT MAY BE RENDERED AGAINST YOU FOR THE MONEY OR OTHER THINGS DEMANDED IN THE COMPLAINT OR OTHER DOCUMENT.

TO ANY SHERIFF OR ANY PERSON AUTHORIZED BY THE ALABAMA RULES OF CIVIL PROCEDURE TO SERVE PROCESS:

☐ You are hereby commanded to serve this Summons and a copy of the Complaint or other document in this action upon the above-named Defendant.

☒ Service by certified mail of this Summons is initiated upon the written request of DENISE MCCURDY
(Name(s))
 pursuant to the Alabama Rules of the Civil Procedure.

1/17/2019 8:03:58 AM /s/ JACQUELINE ANDERSON SMITH By: _____
(Date) *(Signature of Clerk)* *(Name)*

☒ Certified Mail is hereby requested. /s/ EDMOND DEWAYNE EARLE
(Plaintiff's/Attorney's Signature)

RETURN ON SERVICE

☐ Return receipt of certified mail received in this office on _____
(Date)

☐ I certify that I personally delivered a copy of this Summons and Complaint or other document to _____
 _____ in _____ County,
(Name of Person Served) *(Name of County)*

Alabama on _____
(Date)

(Type of Process Server) _____
(Server's Signature)

(Server's Printed Name) _____
(Phone Number of Server)

(Address of Server)